



3. The parties agree that the terms of the Confidential Settlement Agreement, attached to the Parties request to seal the agreement (submitted in paper form), is a fair and reasonable resolution of the dispute between the parties.

4. In a private action between the employer and employee, the court may approve any proposed settlement agreement “after scrutinizing the settlement for fairness.” *Lynn’s Food Stores, Inc. v. U.S. By & Through U.S. Dep’t of Labor, Employment Standards Admin., Wage & Hour Div.*, 679 F.2d 1350, 1353 (11th Cir. 1982); *see also Bennett v. Behring Corp.*, 737 F.2d 982, 986 (11th Cir. 1984) (determining fairness of the settlement to be within the sound discretion of the trial court).

5. The parties jointly represent to the Court that they have reached a fair and reasonable compromise of the issues in this matter and respectfully request that the Court review the Confidential Settlement Agreement and attachments thereto *in camera*, approve such agreement, and dismiss with prejudice all claims and causes of action asserted by all Plaintiffs arising out of the facts forming the subject matter of the captioned proceeding, each party to bear his/her or its own costs.

WHEREFORE, the parties respectfully request that this Court grant this motion approving the Confidential Settlement Agreement and dismiss the claims of Plaintiffs Traci Elias and Daphne Motley, with prejudice, each party to bear

his/her or its own costs, and such other and further relief as the Court deems just and proper.

Respectfully submitted:

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